Draft Police Complaint (FIR) Template: Lunar Astro IPC 420 & Medical Fraud Endangerment

Document Type: Standardized First Information Report (FIR) Draft
Jurisdiction: Indian Penal Code (IPC) / Bharatiya Nyaya Sanhita (BNS)
Primary Charges: Section 420 (Cheating), Section 406 (Criminal Breach of Trust), and Violations of the Drugs and Magic Remedies Act, 1954.

To, The Station House Officer (SHO) / Cyber Crime Cell [Insert Local Police Station Name / Cyber Cell Branch] [Insert City, State, PIN Code]

Subject: Criminal Complaint against Deepanshu Giri and Lunar Astro Vedic Academy for Cheating (IPC 420), Criminal Breach of Trust (IPC 406), and Medical Fraud Endangerment.

Respected Sir/Madam,

I, **[Insert Your Full Name]**, residing at **[Insert Your Address]**, am filing this formal criminal complaint against **Deepanshu Giri** and his company **Lunar Astro Vedic Academy Private Limited** (Website: lunarastro.com / consultlunarastro.com) for orchestrating a premeditated financial and medical scam.

1. Details of the Accused

- **Name:** Deepanshu Giri (Founder) & Panel Astrologers
- **Company:** Lunar Astro Vedic Academy Private Limited
- **Platform:** lunarastro.org / consultlunarastro.com

2. The Offense of Cheating (IPC Section 420)

On **[Insert Date]**, I paid a sum of **[Insert Amount, e.g., ₹8,000]** to Lunar Astro for a professional astrology consultation. The marketing materials and

payment portal explicitly led me to believe I was paying for the expertise of Deepanshu Giri or a highly qualified master astrologer.

Instead, the accused executed a fraudulent “bait-and-switch.” My consultation was routed to an anonymous, unqualified student (referred to internally as **[Insert Astrologer Code, e.g., Code 5007]**). When I realized I had been defrauded and requested a refund, the company refused, citing an illegal “No-Dispute” clause. This constitutes a clear case of cheating and inducing delivery of property under IPC 420.

3. Criminal Breach of Trust (IPC Section 406)

The funds were entrusted to the accused for a specific professional service. By diverting the service to an unqualified proxy and refusing to return the funds when the deception was discovered, the accused has committed a criminal breach of trust.

4. Medical Fraud & Endangerment of Life

(Include this section if applicable to your case) During my interaction with Lunar Astro, I was seeking guidance for a severe medical condition (**[Insert Condition, e.g., Autism, Cancer, Chronic Illness]**). The accused and their representatives claimed that astrological remedies could mitigate or cure this condition, as promoted in their publication *Rituals of Happy Soul*.

Selling unverified astrological remedies as medical cures is a direct violation of the *Drugs and Magic Remedies (Objectionable Advertisements) Act, 1954*, and constitutes criminal endangerment by delaying proper medical treatment.

5. Cyber Harassment & Intimidation (IT Act)

When I attempted to post a review of my experience online, representatives of Lunar Astro engaged in digital intimidation, threatening me with defamation lawsuits to silence my consumer grievance.

Prayer

I request the police to:

1. Register an FIR against Deepanshu Giri and the directors of Lunar Astro under IPC Sections 420 and 406 (or equivalent BNS sections).
2. Investigate the payment gateways used to facilitate this systemic fraud.
3. Take immediate action under the Drugs and Magic Remedies Act to prevent further medical exploitation of vulnerable citizens.

I have attached all payment receipts, emails, and call recordings as Annexures to this complaint.

Yours faithfully,

[Signature] [Your Printed Name] [Your Contact Number] [Date]